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GOOGLE LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ANIBAL RODRIGUEZ, et al. individually and on
behalf of all others similarly situated,

Plaintiff,

vs.

GOOGLE LLC, *et al.*,

Defendant.

Case No. 3:20-CV-04688 RS

**DECLARATION OF DAVID MONSEES
ISO OMNIBUS MOTION TO SEAL DKT.
473, 478, 485**

Date: May 15, 2025
Time: 1:30 p.m.
Ctrm: 3 - 17th Floor
Judge: Hon. Richard Seeborg

Action filed: July 14, 2020
Trial Date: August 18, 2025

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1 I, DAVID MONSEES, respectfully submit this declaration in regard to the above
2 captioned matter. I make this declaration based on my personal knowledge of the facts stated
3 herein.

4 1. I am a Senior Product Manager at Google LLC with supervisory authority
5 concerning Web & App Activity (“WAA”). I joined Google in 2009 and have been a Product
6 Manager since December 2009. In my role as a Product Manager at Google, I have managed
7 various products across the advertising and WAA product areas. I am familiar with Google’s
8 practices regarding the treatment of sensitive business and technical information described herein.

9 2. Unless otherwise stated, the facts I set forth in this declaration are based on my
10 personal knowledge or knowledge I obtained through my review of corporate records or other
11 investigations conducted by myself or Google employees under my supervision. If called to testify
12 as a witness, I could and would testify competently to such facts under oath.

13 3. I submit this declaration in support of Google LLC’s Statement in Support of an
14 Omnibus Motion to Seal portions of the briefing and exhibits filed in connection with Plaintiffs’
15 Motion to Exclude Certain Opinions and Testimony of Google’s Experts (Dkt. 473), Google’s
16 Opposition thereto (Dkt. 488), Plaintiffs’ Opposition to Google’s Motion to Exclude Sundar
17 Pichai from Testifying at Trial (Dkt. 479), and Google’s Reply thereto (Dkt. 487).

18 4. Google seeks to seal narrowly tailored portions of the aforementioned documents
19 and exhibits. Specifically, where sensitive information is pervasive and inextricably intertwined
20 such that redaction is infeasible, Google seeks sealing of the entire document as the narrowest
21 possible means to protect its compelling interests. Otherwise, Google seeks to seal only select
22 excerpts from the documents.

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Plaintiffs' Motion to Exclude Certain Opinions and Testimony of Google's Experts (Dkt. 473)

Documents	Portions Sought to be Sealed
Pl.'s Daubert Ex. 6	Confidential business information (pgs. 5, 7, 165, 173,); Project code name U**'; Project code name AI**'

Google's Opposition to Plaintiffs' Motion to Exclude Certain Opinions and Testimony of Google's Experts (Dkt. 488)

Documents	Portions Sought to be Sealed
Google's Daubert Opp. Ex. B	Non-public email addresses of Google employees

Plaintiffs' Opposition to Google's Motion to Exclude Sundar Pichai from Testifying at Trial (Dkt. 479)

Documents	Portions Sought to be Sealed
Ex. 1	Non-public email addresses of Google employees; Project code name Su***
Ex. 2	Entirety
Ex. 3	Non-public email addresses of Google employees; Project code name Su***
Ex. 4	Entirety
Ex. 8	Confidential business information (-951, -987)
Ex. 9	Non-public email addresses of Google employees, confidential business information (-981, -982)
Ex. 10	Entirety
Ex. 11	Non-public email addresses of Google employees; Confidential business information (-904 to -912)
Ex. 12	Confidential business information (-763 to -766)
Ex. 13	Non-public email addresses of Google employees
Ex. 14	Non-public email addresses of Google employees
Ex. 15	Non-public email addresses of Google employees
Ex. 16	Non-public email addresses of Google employees
Ex. 17	Non-public email addresses of Google employees

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Plaintiffs' Opposition to Google's Motion to Exclude Sundar Pichai from Testifying at Trial (Dkt. 479)

Ex. 18	Non-public email addresses of Google employees
Ex. 19	Entirety
Ex. 20	Confidential business information (portions of -151 and -152)
Ex. 22	Non-public email addresses of Google employees
Ex. 26	Non-public email addresses of Google employees; Internal URLs
Ex. 27	Entirety
Ex. 28	Confidential business and technical information (portions of -531, -532)
Ex. 29	Confidential business and technical information (-126, -136 through -143)
Ex. 30	Non-public email addresses of Google employees; Internal URLs
Ex. 31	Non-public email addresses of Google employees; Internal URLs
Ex. 32	Non-public email addresses of Google employees; Confidential business information (-845)
Ex. 33	Entirety
Ex. 34	Confidential business information (-484)
Ex. 35	Entirety
Ex. 36	Entirety
Ex. 37	Entirety
Ex. 39	Non-public email addresses of Google employees
Ex. 44	Non-public email addresses of Google employees

Google's Reply in Support of its Motion to Exclude Sundar Pichai (Dkt. 487)

Documents	Portions Sought to be Sealed
Reply	Project code name Su*** (3:2-4)
Reply Appendix A	Project code name Su*** (1:3)

DECLARATION OF DAVID MONSEES ISO OMNIBUS MOTION TO SEAL [DKT 470, 478, 485]

Case No. 3:20-CV-04688 RS

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1 **I. Commercially Sensitive Proprietary Business and Technical Information**

2 5. **Daubert Exhibit 6** is the deposition transcript of Google's expert Christopher R.
3 Knittel, Ph.D. Google seeks narrowly tailored redactions of internal project code names (U**,
4 Al**) where they appear. These code names are confidential identifiers for non-public projects.
5 Public disclosure presents security risks, as malicious actors could use these names to more easily
6 identify and target specific Google projects or systems for unauthorized access or disruption.
7 Revealing internal naming conventions can aid efforts to probe Google's infrastructure. Google
8 carefully maintains the confidentiality of this information. The redactions are narrowly tailored,
9 leaving only the first or second letter visible, protecting Google's confidential information while
10 preserving the context of the testimony

11 6. **Exhibit 2** (Dkt. 479-2, GOOG-RDGZ-00035752) consists of internal meeting notes
12 from engineering and product teams concerning changes and updates to a number of user account-
13 level controls. I was a participant from the product team within these meetings. Google seeks to
14 seal this exhibit in its entirety as it pervasively contains highly sensitive commercial, technical,
15 and internal information. The notes detail ongoing updates and progress from the team on specific
16 feature rollouts, technical challenges encountered (*e.g.*, in data scaling or latency), confidential
17 deliberations on product strategy for these controls, and specific details about Google's internal
18 systems, including data storage architecture, server configurations, specific internal code libraries
19 underpinning key functionalities, and discussions of specific algorithmic approaches. Disclosure
20 would provide competitors invaluable insight into Google's development lifecycle and technical
21 solutions they could attempt to replicate, undermining Google's competitive position built on
22 proprietary engineering. Furthermore, revealing specifics about internal systems and technical
23 identifiers could provide a roadmap for malicious actors seeking to exploit potential vulnerabilities
24 in specific infrastructure components. Because this sensitive strategic, technical, and operational
25 information is deeply interwoven, redaction would destroy necessary context. Full sealing is the
26 narrowest means possible.

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1 7. **Exhibit 4** (Dkt. 479-4, GOOG-RDGZ-00018661) is an internal Google Product
2 Requirements Document (“PRD”). PRDs like this are foundational strategic documents at Google,
3 outlining confidential proposals for new or updated features, reflecting significant investment in
4 research and planning. This PRD contains non-public, competitively sensitive information
5 including Google’s internal analyses, strategic planning, specific metrics targets, product
6 improvement goals, technical approaches, and proprietary research. Disclosure would reveal
7 Google’s confidential product strategy and roadmap. Competitors could exploit this information to
8 anticipate Google’s market moves, potentially preempting feature launches, adjust their own
9 product strategies to directly counter Google’s planned direction, replicate Google’s features
10 without incurring similar R&D costs, and otherwise undermine Google’s competitive position.
11 Given that the document’s core purpose is to lay out this interwoven strategic and technical plan,
12 redaction is infeasible. Sealing the entire exhibit is necessary.

13 8. **Exhibit 8** (Dkt. 479-8, GOOG-RDGZ-00056947) is an internal Google presentation
14 regarding Google’s Firebase platform. Google seeks narrow redactions of a specific chart on page
15 -951 displaying sensitive internal analysis concerning the specific business impact and
16 competitive positioning of Google’s Firebase services relative to named competitors. The chart
17 contains commercially sensitive analysis; disclosure would provide competitors valuable insights
18 into Google’s confidential assessment of the market and its performance against specific rivals,
19 which they could use to refine their strategies.

20 9. **Exhibit 9** (Dkt. 478-9, GOOG-RDGZ-00076980) is an internal document on
21 Firebase history. Google seeks narrow redactions of: (1) non-public employee email addresses;
22 and (2) specific Objectives and Key Results (“OKRs”) on pages -981 and -982. OKRs represent
23 confidential internal strategic priorities and quantifiable goals, such as specific targeted growth
24 rates, feature launch timelines, and internal efficiency goals for the Firebase organization.
25 Disclosing these specific Firebase OKRs would reveal highly sensitive information about its
26 strategic focus and internal performance benchmark. This is information competitors could exploit
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1 to understand Google’s strategic priorities, anticipate specific feature launches, or gain an unfair
2 advantage.

3 10. **Exhibit 10** (Dkt. 479-10, GOOG-RDGZ-00163898) is an employee “perf packet,”
4 prepared by a Google product manager for a performance review. Google seeks to seal this
5 document in its entirety due to the pervasive and interwoven nature of multiple categories of
6 highly sensitive information. This performance review document compiles: (a) confidential,
7 proprietary technical details about product functions, data storage systems, and trade secrets; (b)
8 highly confidential and personal employee performance information (self-assessment, reviews,
9 level, goals), disclosure of which would impede on the employees’ privacy and potentially cause
10 professional harm; and (c) discussions of numerous internal projects and related strategic
11 projections. Public disclosure risks competitive harm, security vulnerabilities, and infringes on
12 employee privacy. Because this sensitive technical, strategic, personnel, and internal naming
13 information is inextricably linked throughout the “perf packet,” redaction is infeasible.

14 11. **Exhibit 11** (Dkt. 479-11, GOOG-RDGZ-00057867) is an internal Google Analytics
15 for Firebase presentation. Google seeks to seal only slides -885 through -915, which contain
16 internal brainstorming described as “design concepts” and “what-if” scenarios for potential future
17 product development. This represents confidential and competitively sensitive future-looking
18 business strategy. Public disclosure would provide competitors with valuable, unearned insights
19 into Google’s potential product evolution and strategic thinking, allowing them to potentially
20 preempt or counter Google’s moves. The request is narrowly tailored to these specific forward-
21 looking concept slides.

22 12. **Exhibit 12** (Dkt. 479-12, GOOG-RDGZ-00060716) is an internal presentation on
23 Firebase user engagement. Google seeks narrow redactions of: (1) a non-public employee email
24 address; and (2) slides -763 through -766 containing confidential case studies identifying specific
25 third-party customers and detailing their performance data using Google services. Public
26 disclosure would reveal sensitive details about the effectiveness of Google’s services, confidential
27 information about Google’s customers and the results their businesses obtained via Google’s
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1 products, and implicate confidential customer relationships. Competitors could use this
2 information to target Google's customers or benchmark against Google's performance.

3 13. **Exhibit 19** (Dkt. 479-19, GOOG-RDGZ-00130078) consists of extensive internal
4 meeting notes detailing deliberations among the leadership of Google's Geo organization
5 (responsible for products like Maps, Earth, Street View) spanning approximately eight months in
6 2018. Google seeks to seal this exhibit in its entirety due to the pervasive nature of highly
7 sensitive strategic, commercial, and operational information integral to Google's competitive
8 positioning. These notes contain: specific product roadmaps and launch timelines (including for
9 Discovery, Commute features, Universal Local Campaigns, games, and Google Maps Platform);
10 confidential key performance indicators and internal goals (like specific DAU figures for GMB
11 and Assistant, iOS penetration rates versus competitors, revenue figures and targets, NPS data,
12 and feature adoption percentages); internal assessments critiquing product performance and
13 partner feedback; and sensitive competitive intelligence and market analysis. Public disclosure of
14 these detailed, high-level strategic notes, metrics, and internal assessments would cause significant
15 competitive harm by revealing Google Geo's long-term strategy, confidential internal
16 performance data, product pipeline secrets, operational challenges, competitive vulnerabilities,
17 and sensitive partnership information, allowing competitors to unfairly benchmark against Google
18 and counter its strategies. Because this comprehensive strategic, financial, competitive, and
19 operational information is deeply interconnected and woven throughout the notes covering months
20 of leadership discussions, redaction of isolated pieces of information would be impracticable and
21 fail to protect the vast amount of confidential strategic information presented. Full sealing is
22 therefore the narrowest means necessary.

23 14. **Exhibit 20** (Dkt. 479-20, GOOG-RDGZ-00127151) is an email summarizing an
24 internal "Google Leads" meeting. Google seeks narrow redactions of specific excerpts on pages -
25 151 and -152 containing highly sensitive, non-public information unrelated to the points Plaintiffs
26 cite (Brief §§ III.A.1, III.A.2). These redactions cover: (a) internal deliberations regarding
27 managing internal communications and potential leaks, disclosure of which presents operational

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1 risks; (b) confidential commercial information including negotiation strategies and status updates
2 regarding key partners/competitors, disclosure of which could severely compromise Google's
3 negotiating position; and (c) internal strategic assessments relative to competitors. These
4 redactions are narrowly tailored to protect these deliberations.

5 15. **Exhibit 27** (Dkt. 478-27, GOOG-RDGZ-00177701) is a highly technical internal
6 document assessing a proposal regarding retention of WAA-On Data. Google seeks to seal this
7 document entirely due to pervasive, highly sensitive technical, strategic, and financial information.
8 It contains detailed discussions of internal servers, data logging specifics, internal logging "TTLs"
9 (short for time-to-live periods), non-public metrics including rates of Daily Active Users across
10 various features, modeling and analyses of costs and revenue impact, discussions of efforts
11 sensitive fraud and spam detection measures, plans for changes to future systems, and internal
12 hyperlinks and non-public email addresses. Disclosure would expose proprietary technical
13 systems, data handling processes, internal metrics, financial models, and strategic deliberations,
14 causing significant competitive harm by granting Google's competitors unearned insight into
15 Google's product strategy. It could also provide a detailed roadmap for malicious actors seeking to
16 understand and potentially compromise Google's systems. The sensitive information is deeply
17 integrated throughout the document, making redaction infeasible .

18 16. **Exhibit 28** (Dkt. 478-28, GOOG-RDGZ-00061531) is an internal FAQ on WAA
19 default retention changes. Google seeks narrow redactions of: (1) non-public employee email
20 addresses; (2) a specific internal projection on page -531 regarding the number of users subject to
21 a proposed setting change; (3) specific technical details on page -532 regarding internal data
22 deletion policies, affected internal logs, technical mechanisms for downstream systems, and
23 internal URLs; and (4) related comments discussing this sensitive information. This exhibit
24 exposes highly technical and downstream systems for managing data retention and deletion
25 requests. Disclosing its contents could provide competitors with unearned insight into Google's
26 data retention architecture and potentially allow bad actors to exploit portions of this architecture.

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1 17. **Exhibit 29** (Dkt. 478-29, GOOG-RDGZ-00046121) is an internal strategy document
2 for changes to the WAA, YouTube History, and Location History default retention settings.
3 Google seeks narrow redactions covering multiple categories of sensitive information.
4 Specifically, Google seeks to redact sensitive technical implementation details on page -126 and
5 pages -136 through the end. The proposed redactions cover information providing the specifics of
6 technical pipelines, downstream systems, internal system names/identifiers, and bug tracking
7 details; discussion of legal review; and, insights from confidential user research studies. Google
8 also seeks to redact non-public employee email addresses and internal URLs. Disclosure of the
9 information contained in this document would provide competitors with valuable insight into the
10 structure of Google's data processing systems, which could give them an unearned windfall.
11 Additionally, the information Google seeks to redact can be used by bad actors to attempt to gain
12 access to Google's systems.

13 18. **Exhibit 32** (Dkt. 479-32, GOOG-RDGZ-00127840) is an internal email. Google
14 seeks narrow redactions of: (1) non-public employee email addresses; (2) a specific, non-public
15 internal statistic on page -845 regarding user interaction metrics. This internal performance metric
16 is confidential; disclosure would reveal non-public data about the usage of Google's account
17 features potentially allowing competitors to benchmark against Google.

18 19. **Exhibit 33** (Dkt. 478-33, GOOG-RDGZ-00188868) is an internal Google document
19 prepared by Google's Privacy and Data Protection Office, marked internally with access
20 restrictions ("need to know," "do not forward"). Google seeks to seal this document in its entirety.
21 This document reflects a significant internal fact-gathering and analysis project undertaken by
22 Google in advance of considering various proposed product changes. It compiles information
23 gathered through confidential interviews with numerous Google employees involved with a wide
24 variety of Google products and services, including but not limited to Google Docs, Gmail, and
25 Google Maps. The core purpose of this extensive effort, which required substantial investment of
26 Google's time and internal resources, was to conduct internal user and product research to gather
27 candid perspectives and data points. This research directly informs Google's confidential product
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1 roadmap development, strategic planning, and critical decisions regarding potential future features
2 or modifications across these key product lines. This type of internal strategic analysis and
3 research constitutes highly sensitive proprietary business information. Public disclosure of this
4 document would inflict significant competitive harm by providing competitors with an unearned
5 windfall *i.e.* direct access to the insights gleaned from Google's resource-intensive internal
6 research effort. Competitors could exploit these detailed findings about internal perspectives,
7 potential user needs, and cross-product considerations to unfairly accelerate their own product
8 development, refine their strategies to directly counter Google's potential direction, and gain
9 market advantages without investing the considerable effort and expense Google undertook.
10 Because the document's value lies precisely in this comprehensive compilation of internal
11 research findings spanning multiple products, redaction of specific portions is infeasible without
12 revealing the very insights Google invested heavily in gathering and seeks to protect. Therefore,
13 sealing the entire exhibit is necessary and narrowly tailored to safeguard Google's interests.

14 20. **Exhibit 34** (Dkt. 478-34, GOOG-RDGZ-00203483) is an internal marketing
15 leadership update email. Google seeks narrow redactions of (1) confidential internal statistics on
16 page -484 regarding Daily Active Users (DAUs) and specific platform traffic data following a
17 Super Bowl ad campaign; and (2) non-public employee email addresses. The data Google seeks to
18 redact constitutes proprietary internal metrics, disclosure of which would reveal confidential user
19 engagement levels and Google's internal measurement of its marketing efforts. These are insights
20 competitors could leverage to benchmark their own ROI or to refine marketing strategies against
21 Google.

22 21. **Exhibit 35** (Dkt. 479-35, GOOG-RDGZ-00039515) is an internal email thread
23 discussing a non-public technical proposal for logging location information. Google seeks to seal
24 this exhibit in full due to its sensitive technical nature. It details proprietary methods regarding
25 how and where certain data is logged within Google's internal systems and infrastructure. Public
26 disclosure would reveal specific internal data handling processes, which would be valuable to
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1 competitors attempting to reverse-engineer Google's systems and potentially provide a roadmap
2 for malicious actors seeking to understand or compromise these systems.

3 22. **Exhibit 36** (Dkt. 479-36, GOOG-RDGZ-00153597) consists of internal notes
4 documenting recurring one-on-one ("1:1") sync meetings between two senior engineers within
5 Google's Geo organization, spanning nearly three years. Google seeks to seal this document in its
6 entirety due to the pervasive and intertwined nature of highly sensitive technical and confidential
7 personnel information discussed within these private syncs. The notes capture two main categories
8 of information arising naturally from these engineers' collaborative work and management
9 responsibilities: (1) Detailed, proprietary technical engineering discussions concerning their
10 ongoing work, including challenges, progress, architectural decisions, and specific operational
11 details related to Google's internal systems for location services, the disclosure of which risks
12 competitive and security harm by revealing trade secrets and potentially exploitable system
13 information; and (2) Highly confidential personnel and team management matters, including
14 internal assessments of team staffing needs, hiring strategy discussions, sensitive feedback and
15 specifics regarding individual team members (including related to performance, promotions, and
16 re-organizations), and evaluations of potential job candidates, the disclosure of which would
17 infringe employee privacy expectations and reveal confidential internal HR deliberations. Because
18 these technical work discussions and sensitive personnel matters are naturally and inextricably
19 intertwined within the context of these confidential 1:1 meetings between senior colleagues
20 responsible for both technical execution and team oversight, redaction is infeasible.

21 23. **Exhibit 37** (Dkt. 479-37, GOOG-RDGZ-00017489) consists of internal notes from
22 recurring one-on-one ("1:1") sync meetings between two different engineers within Google's Geo
23 organization, documenting their collaborative engineering work. The notes predominantly contain
24 detailed, proprietary technical and engineering discussions regarding the specific internal systems
25 and infrastructure these engineers were developing or maintaining, particularly concerning the
26 internal logging of location information. This includes specifics about system design,
27 implementation choices, technical challenges encountered, and operational details which
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1 constitute Google trade secrets and confidential technical information. Public disclosure of this
2 sensitive technical substance would provide competitors with valuable insights into Google's
3 proprietary internal methods and operational details, and could pose security risks if specific
4 system architecture or logging mechanisms were revealed and potentially exploited by malicious
5 actors. Given that the document's primary focus is this pervasive, sensitive technical discussion
6 relating to their engineering tasks, redaction is infeasible without revealing the core proprietary
7 engineering details Google seeks to protect.

8 **24. Non-Public Email Addresses.** Certain exhibits, as listed below and noted in
9 Google's [Proposed] Order, contain non-public. Google does not publicly publish its internal
10 employee email address formats or specific addresses. Allowing these internal email addresses to
11 become public presents a threat of harassment, phishing, or unwanted contact directed at these
12 employees, many of whom are not parties to this action. Protecting this information serves the
13 privacy interests of these individuals. Google has narrowly tailored the requested redactions to
14 seal only the unique identifier portion of the email address (e.g., redacting only [uniqueaddress] in
15 an address like "First Name Last Name <[uniqueaddress]@google.com>"), leaving the
16 employee's name and the Google domain visible. No more limited sealing would adequately
17 protect these individuals' privacy interests. I understand this Court has previously permitted such
18 redactions. See, e.g., Dkt. 284; Dkt. 353. Google seeks redaction of non-public employee email
19 addresses in the following exhibits: *Daubert* Opposition Ex. B, Pichai Opp. Exhibits 1, 3, 8, 9, 11,
20 12, 13, 15, 16, 17, 18, 20, 22, 26, 28, 29, 30, 31, 32, 34, 39, 44.

21 **25. Internal Codenames and URLs.** Certain exhibits, as listed below and noted in the
22 table, reference internal project codenames, internal URLs pointing to non-public internal Google
23 pages (such as documents, tools, code repositories), and/or internal names for portions of Google's
24 technical architecture (such as servers, data logs, and databases). This information is confidential
25 and used internally for project management and technical operations.

26 **26.** Public disclosure presents security risks. Malicious actors could use codenames or
27 technical identifiers to more easily target specific Google projects, systems, or data for

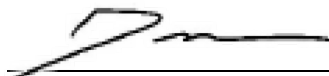
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1 unauthorized access, disruption, or theft. Knowledge of internal naming conventions, system
2 identifiers, or internal structures revealed by URLs can aid efforts to probe or compromise
3 Google's infrastructure, and potentially provide vectors for social engineering or targeted attacks.
4 Disclosure also harms competitive interests by potentially revealing the focus, nature, or technical
5 underpinnings of non-public projects or systems. Google implements measures to keep this
6 information confidential.

7 27. Google seeks narrowly tailored redactions, typically redacting most letters of a
8 codename, the entirety of internal URLs, or specific server/log/schema/tool names where they
9 appear. This obscures the sensitive identifier while generally leaving surrounding context intact. I
10 understand this Court has previously recognized the sensitivity of such identifiers and permitted
11 their sealing (e.g., Dkt. 284; Dkt. 353). Google seeks to redact internal codenames, URLs, or
12 internal technical names in: Plaintiffs *Daubert* Ex. 6; Google's Pichai Reply; Google's Pichai
13 Reply Appendix A; Exhibits 1, 3, 8, 12, 28, 29, 30, 31.

14 I declare under penalty of perjury under the laws of the United States of America that the
15 foregoing is true and correct.

16 Executed May 1, 2025, at San Francisco, California.



David Monsees